

ORIGINAL

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FILED
DISTRICT COURT OF GUAM

FEB 15 2007

MARY L.M. MORAN
CLERK OF COURT

7 Attorneys for the United States of America

8 **IN THE UNITED STATES DISTRICT COURT**

9 **FOR THE DISTRICT OF GUAM**

10 UNITED STATES OF AMERICA,)

11 Plaintiff,)

12 vs.)

13 STEVE KIM,)

14 Defendant.)
15

CRIMINAL CASE NO. 04-00047

**GOVERNMENT'S MOTION FOR
SUBSTANTIAL ASSISTANCE
DEPARTURE**

16 The United States hereby moves this Honorable Court for a departure from the
17 Guidelines level, as provided by USSG Section 5K1.1, on the basis that defendant has rendered
18 substantial assistance to the government in its investigation of drug trafficking on Guam.

19 The government is filing under seal a separate sentencing memorandum concerning the
20 details of that cooperation. The government is recommending that defendant receive an eight (8)
21 point reduction to Level 25 which would allow a sentencing range of 57 to 71 months. The
22 government will recommend a 57 months sentence.

23 RESPECTFULLY SUBMITTED this 14 day of February, 2007.

24 LEONARDO M. RAPADAS
United States Attorney
25 Districts of Guam and NMI

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27 By: 
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FREDERICK A. BLACK
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